

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

C.A. No. 05-10490 NMG

NANCY BUCKLEY,)
 Plaintiff)
)
)
v.)
)
CITY OF BROCKTON)
SCHOOL DEPARTMENT,)
 Defendant)
)

JOINT STATEMENT PURSUANT TO LR 16.1

In compliance with Fed. R. Civ. P. 26(f) and Local Rule 16.1, the parties to the above-captioned action conferred for the purposes of preparing an agenda of matters to be discussed at the scheduling conference; preparing a proposed pretrial schedule, including a discovery plan; and considering the option of trying this case before a magistrate judge.

The parties have conferred, pursuant to Local Rule 16.1(b) (3), and do not consent to trial of this action before a Magistrate Judge.

The Plaintiff has provided the defendant with her mandatory disclosures; the Defendant will provide its mandatory disclosure by the time of the conference.

In addition, pursuant to Local Rule 16.1(C), Plaintiff made a written settlement proposal to Defendant's counsel.

The certificate required by Local Rule 16.1(D) (3), from Plaintiff will be provided under separate cover. The defendant's 16.1 (D) (3) certificate will be provided under separate cover.

The Plaintiff requests that all documents produced by the parties in response to discovery requests will be numbered consecutively.

LOCAL RULE 16.1(D) PROPOSED PRE-TRIAL SCHEDULE

I. Discovery schedule

- A. Interrogatories and Requests for Documents must be served by February 5, 2006.
- B. Depositions must be completed by May 5, 2006.
- C. Mandatory disclosures by a party pursuant to Rule 26 have been made by all parties.
- D. Requests for Admissions must be served by May 5, 2006.
- E. The parties will identify any expert witnesses who may testify on their behalf at trial and will provide expert disclosures, as required by Fed. R. Civ. P. 26(a) (2), by April 5, 2006, or sooner as may be required pursuant to Fed. R. Civ. P. 26, 33 or 34.
- F. The parties will identify any rebuttal expert witnesses who may testify on their behalf at trial and will provide expert disclosures, as required by Fed. R. Civ. P. 26(a) (2), no later than May 5, 2006.

II. Motion Scheduling

- A. The parties shall file all dispositive motions, including Rule 56 Motions, together with supporting documents, by June 5, 2006.
- B. Oppositions to Rule 56 motions, filed pursuant to Subsection A above, must be filed by July 11, 2006.
- C. Rule 56 Reply Memorandums, if any, must be filed by July 21, 2006.
- D. The Court will schedule a pre-trial conference after August 22, 2006.

Respectfully submitted,

The Plaintiff,
By her Attorneys
s/Kevin G. Powers

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